

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF WISCONSIN**

IN RE

Roger Peter Rinaldi and Desa Lilly Rinaldi,

Debtors

Chapter 13

Case No. 11-35689-svk

Roger Peter Rinaldi, et al.,

Plaintiffs,

Adversary No.12-02412-svk

v.
HSBC Bank USA, N.A., et al.,

Defendants.

**AFFIDAVIT OF STEPHANIE L. DYKEMAN IN SUPPORT OF MOTION FOR
EXTENSION OF TIME TO RESPOND TO THE ADVERSARY COMPLAINT**

STATE OF WISCONSIN)
)
WAUKESHA COUNTY)

STEPHANIE L. DYKEMAN, being first duly sworn, makes this affidavit and on oath states the following upon her own personal knowledge:

1. Affiant is a partner with Litchfield Cavo LLP and is authorized to make this Affidavit.

2. On June 17, 2012, plaintiffs filed an Adversary Complaint against defendants HSBC Bank USA, National Association as Trustee for Wells Fargo Home Equity Asset-Backed Securities 2005-2 Trust, Home Equity Asset-Backed Certificates, Series 2005-2, Wells Fargo Bank, N.A., Wells Fargo Asset Securities Corporation, America's Servicing Company,

Litchfield Cavo LLP, Brad A. Markvart, Gray & Associates LLP, William N. Foshag, Duncan C. Delhey, Jay Pitner, and Brian D. Perhach.

3. The voluminous allegations against the defendants set forth in the Adversary Complaint arise in part from a prior foreclosure action before the Kenosha County, Wisconsin circuit court, HSBC Bank USA, National Association, as Trustee for Wells Fargo Asset Securities Corporation Home Equity Asset-Backed Certificates, Series 2005-2, c/o Wells Fargo Bank, N.A. v. Roger P. Rinaldi and Desa L. Rinaldi, Kenosha County Case No. 09-CV-0353 (“Foreclosure Action”).

4. The voluminous allegations against the defendants set forth in the Adversary Complaint also arise in part from a civil action currently pending before the Kenosha County, Wisconsin circuit court, Roger and Desa Rinaldi v. Wells Fargo Bank, N.A. et al., Kenosha County, Wisconsin Case No. 11-CV-1477 (“Civil Action”).

5. On June 20, 2012, I sent a letter to the court reporter for Judge Bruce Schroeder of Kenosha County seeking transcripts for the hearings in the Foreclosure Action and the Civil Action. Submitted herewith as Exhibit 1 is a true copy of the letter I sent to the court reporter.

6. As of the execution of this Affidavit I have not received the requested transcripts.

/s/ Stephanie L. Dykeman
Stephanie L. Dykeman

Subscribed and sworn to before me
this 12th day of July, 2012.

/s/ Jacqueline A. Kohlmann
Notary Public, State of Wisconsin
My commission expires on April 19, 2015.